Winnegbago Reclamation Service

8403 Lindenwood Road • Rockford, IL 61109 • Tel: (815) 874-4806 • Fax: (815) 874-4630

September 20, 2002

Mr. Bernie Schorle
Remedial Project Manager
United State Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Pagel Facility – Five Review – Response to Public Comments

Dear Bernie:

On behalf of Winnebago Reclamation Service (WRS) I have provided the following information in response to comments received by the USEPA during the five year review of the Pagel Landfill Facility.

The majority of the comments were received from individuals who live over 2000 feet from the North Unit (Operable Unit 1) in an upgradient or upgradient and slightly side gradient direction to the groundwater flow in the area. The comments that are related to the status of the North Unit are primarily health concerns over the quality of their drinking water or the smell of the landfill at certain times in the vicinity of landfill facility. At least of some of the individuals that have expressed concerns about the drinking water quality have had their drinking water tested one or more times within the last 5 years. The testing was performed by the Illinois EPA and none of the testing has shown results that would indicate that the landfill is causing an impact to their drinking water.

The presence of odors adjacent to a landfill is a common occurrence and could be due to a number of different sources. The comments did not indicate that it was a continuous smell but occurred on various occasions for a period of time and at other times the odor was not noticed. Since the odor was not continuous it was most likely due to periods when the location of the active fill was adjacent to the Lindenwood road or active disposal of a particular waste stream at the time the odor was noticed. Although it could have been the result of landfill gas, the odor from landfill gas will generally be more continuous in nature and not vary with the time of day.

There was one comment letter received from Dean Ekberg that expressed concern over a number of different issues. Mr. Ekberg operates a quarry that is approximately 700 feet upgradient of the landfill and immediately adjacent to the north boundary of the ACME Solvents Superfund site. Since a number of specific concerns were raised by Mr. Ekberg, the following responses are offered to directly address his comments.

1. While it is correct that the 1991 Record of Decision called for closure of the landfill, the statement in Mr. Ekberg's letter is misleading. All of the potential remedies examined in the 1991 ROD planned for the North Unit to continue to operate until it reached the final design capacity approved by the Illinois EPA. Therefore, the remedy specified in the 1991 ROD provided that the landfill would be filled to its permitted capacity and closed in accordance with the state regulations applicable to municipal waste landfills. That is exactly what has been done.

   The 1991 ROD also anticipated that further study of the hydrogeology and groundwater impacts associated with the landfill would be required to define the design of a pump and treat system for impacted groundwater down-gradient of the landfill. The actual remedy anticipated in the 1991 ROD was groundwater extraction and air stripping or carbon adsorption as the suggested treatment method. The possibility that additional treatment would be necessary to remove inorganic components prior to air stripping was acknowledged, but would be required only as a contingency. Air sparging was not considered in the 1991 ROD. In-situ air sparging was considered as part of the "Alternatives Analysis" in the 1999 ROD amendment. However, air sparging was never considered as part of the treatment technology for a "pump and treat system".

2. The 1991 ROD was not adopted "to remove the high concentration of heavy metals and solvents that were pouring out of the bottom of the liner." This assertion is incorrect in several respects. First, at no time were contaminants "pouring out of the bottom of the liner." In fact, the 1991 ROD stated, "No principal threat has been found at the site", and indicated that the potential threat was primarily due to the fact that the site is an operating municipal solid waste landfill (MSWLF). The remedy for the site included "containing low level threats" in manner consistent with the requirements for the operation of other MSWLF's in Illinois. Second, the solvents detected in the groundwater in the vicinity of Pagel's originated at the uncontrolled Acme Solvents dump site, a site where solvents and paint wastes were in fact poured into unlined ponds and ditches on the fractured bedrock surface. None of the organics mentioned in the respondents' comments were attributed to the landfill in the original 1991 ROD. Low levels of organics that the USEPA attributed to the landfill were only found immediately adjacent to the landfill and primarily within the zone of attenuation as defined in Title 35 Illinois Administrative Code Section 810. Groundwater within the zone of attenuation is a restricted use groundwater under Illinois regulations and the regulations allow for exceedance of the applicable groundwater quality standards within the zone of attenuation. Third, the metals detected in the groundwater in the vicinity of Pagel's are naturally occurring minerals that have also been detected in wells upgradient of the landfill.

3. The comment and supporting discussion that indicate that the groundwater monitoring system is improperly designed is not based on any facts and is simply a hypothetical argument that is not even close to being true. It also ignores the tremendous amount of hydrogeological information used to design the monitoring system. The design of the monitoring systems is based on a number of different hydrogeological investigations and the information gathered from monitoring wells screened at various elevations in all of the aquifer units located in the vicinity of the landfill. The locations of the monitoring wells used for the groundwater monitoring system were selected based on horizontal and vertical gradients as well as the localized groundwater flow directions. There are a number of additional monitoring wells which were installed for investigative purposes that are not used for the monitoring system. The groundwater monitoring system includes wells that are located within the geologic units that are alleged to have been missed.

4. The assertion that groundwater sampling and analysis procedures used at the Pagel's facility are subject to manipulation by the site's owner is a deliberate attempt to mischaracterize the process used to collect and analyze groundwater samples. Groundwater sampling and analysis at both the Acme Solvents and Pagel's facilities is conducted by independent professionals following quality control/quality assurance protocols that have been approved by Illinois EPA and USEPA. This same procedure is used at virtually every Superfund site at which groundwater monitoring is conducted. In this area alone, the same practice is followed at the Spencer Park (Belvidere Landfill No. 1) Landfill, MIG DeWane Landfill, and the IPC site. The site owner has no control whatever over the results of sampling. Instead, independent field sampling personnel and laboratories that are subject to USEPA and IEPA reviews and inspections conduct the analysis of all of the samples.

   Moreover, extensive groundwater data has been collected at the Pagel's facility since the Superfund process began. Any unusual analytical results would stand out against the historical record. The implication that the sampling and analytical procedure is not reliable or is subject to manipulation by the site's owner is completely without basis.

5. There is no merit to the statement that improper materials were used for the final cover of the North Unit. The construction of the final cover on the North Unit was observed and documented by a third party Construction Quality Assurance (CQA) Officer. This is the same licensed professional engineer that provided oversight for the final cover construction of the western portion of the North Unit. The on-site CQA staff kept daily logs of all the on-site activities during the construction of the final cover. There were also numerous individuals who worked for the construction contractor that would have been aware of any improper disposal of waste during the construction of the final cover. To suggest that the CQA officer and dozens of individuals, with no connection to the landfill operations, knowingly disposed of contaminated soil by incorporation into the final cover is preposterous.

   The landfill did receive contaminated soil from the Parsons Casket site in Belvidere, Illinois. The soil was properly disposed of in the landfill prior to the initiation of the

construction of the final cover. The Illinois EPA arranged for the disposal of the soil and is listed as the generator on the Special Waste Profile. The chemical analysis of the soil indicates that there were no metals or organic compounds that were above the detection limits. A copy of the special waste profile is included in Attachment A.

The vegetative layer of the final cover includes composted landscape waste as a soil amendment. The use of compost or partially finished compost as a soil amendment to promote vegetative growth and as a stabilizing material to hold seed in place and conserve moisture is a common practice for any landscaping project. It is also specifically allowed by the governing conditions within the landfill's operating permit and by state regulations.

6. The statement that "most of the leachate releases occur at night and during heavy rains in what seems to be an attempt to hide discharge" is false. There are no leachate discharges from the landfill other than discharges of leachate to the Rock River Water Reclamation District sewer line. There is no discharge of leachate to streams or waterways. There are no hoses or other devices used to discharge leachate to Kilbuck Creek and rolled up at night. Nor are there any USEPA or Illinois EPA documentation of direct discharges of leachate to Kilbuck creek. Any statement suggesting that such documentation exists is false. It is also questionable what bearing any allegations of activities that were alleged to have occurred 16 years ago would have upon the current five year review.

Many of the comments provided by Dean Ekberg appear to be deliberate and unsubstantiated fabrications that are attempts to suggest that our operations are improper and that the USEPA and the Illinois EPA are ignoring the real truth. Mr. Ekberg has openly accused the USEPA and the USEPA of colluding with Rockford area businesses to cover up the "massive amounts of pollution being dumped into our aquifers". His claims are unsubstantiated and ignore the track record of oversite and compliance that the overwhelming majority of area businesses have established. Winnebago Reclamation Service has a proven history of consistently working with Illinois EPA and the USEPA to ensure that the operation of the landfill will not affect the public heath or safety. We have no history of non-compliance with state or federal regulations that would provide any merit to Mr. Ekberg's undocumented allegations. Fabrications of the nature that Mr. Ekberg has provided to the USEPA and state and local regulatory agencies create an unnecessary expenditure of time and resources by all the parties involved and takes valuable time and resources away from meaningful environmental issues.

Mr. Ekberg has also indicated that the 1999 Record of Decision amending the original 1991 ROD was not based upon a proper understanding of the hydrogeology or other factors affecting the potential risk to public safety and health. The Pagel Landfill Facility and the ACME Solvents site is one of the most extensively studied and characterized locations in the state. The studies upon which the original ROD decision was based were done in the mid 1980's to 1991. Since that time there have been a number of additional investigations around both the landfill and the Acme Solvents site. The investigations included additional hydrogeological studies, feasibility analyses, and ongoing groundwater monitoring. The additional investigations have generally focused upon providing a better understanding of the groundwater chemistry down gradient of the landfill

(west) and the flow of groundwater in the vicinity of both sites. The studies have also examined the biological and chemical processes that occur within the groundwater at both sites and the interrelationship between the Acme Solvents site and the Pagel Landfill.

Since groundwater in the area flows from the ACME Solvents site towards the Pagel Landfill, the groundwater conditions at the landfill cannot be accurately assessed without an understanding of the processes affecting groundwater conditions at the ACME Solvents site. The processes that can affect groundwater characteristics include surface water recharge, chemical reactions and biological reactions. All of these processes are affected by activities which take place within or around the ACME Solvents facility. A number of different activities have take place since the original studies that have impacts on these processes and in turn affect the groundwater within the ACME Solvents and Pagel Landfill site boundaries. Some of the subsequent activities are as follows:

- A tremendous quantity of contaminated soil was removed from the ACME Solvents facility during the late 1980's and the site was extensively regarded. At the Pagel's facility, after reaching the final design grades, the North Unit of the Pagel Landfill was closed and the final cover installed during the period between 1997 and 2001. All of these activities have an affect on the "redox" conditions of the groundwater and consequently will have an impact on groundwater characteristics. The most significant effect, however, will be the reduction or elimination of sources of groundwater impacts.

- A better understanding of the natural processes that can occur to degrade chlorinated solvents has evolved since the initial ROD was issued. The initial health and safety risks assessed in connection with the Acme and Pagel's sites were based on the belief that natural processes would not result in the degradation of chlorinated solvents into inert compounds. More recent studies have documented that complete degradation does occur. A better understanding of biological and physical processes that occur in aquifers has allowed "Monitored Natural Attenuation" to be considered as method to remediate impacted aquifer systems.

- Additional groundwater studies and calibrated flow models of the area groundwater have more clearly defined travel times and potential flow paths of the groundwater in the ACME/Pagel area. These studies confirm that it will take a minimum of 6 years for groundwater particles to travel from the ACME Solvents site to the western edge of the landfill.

- The levels of contamination in the groundwater west of the Pagel landfill have never presented a current or future risk. In fact, excepting instances within the zone of attenuation, there are very few and isolated instances where the levels of constituents within the groundwater have exceeded the drinking water standards. Moreover, the removal and reduction of the potential sources of groundwater impacts that could affect future theoretical uses have greatly reduced the potential future risk as well.

An objective review of the remedial activities that have occurred at the Pagel's facility over the past five years shows that we have a more complete understanding of the various processes affecting the groundwater and confirms that monitored natural attenuation as the appropriate remedial approach to the Pagel Landfill Facility.

Thomas Hilbert
Winnebago Reclamation Service

Cc: John Holmstrom – William-Charles Ltd.

ATTACHMENT A

ANDREWS ENVIRONMENTAL ENGINEERING INC. 3535 Mayflower Blvd., Springfield, Illinois 62707/(217) 787-2334

July 23, 1999

John D. Lichty
Plant Operations Manager
NRG Technologies, Inc.
8403 Lindenwood Road
Rockford, Illinois 61109

re: Special Waste Stream Review
Pagel Landfill

Illinois Environmental Protection Agency
Non-Hazardous Contaminated Soil
#90-114S/0057

Dear Mr. Lichty:

The Illinois Environmental Protection Agency is requesting the disposal of contaminated soil generated from a facility located in Belvidere. The analysis dated July 22, 1999 from First Environmental Laboratories, Inc. shows the required parameters below hazardous limits. There are no problems indicated by this analysis.

The incorrect IEPA Generator Code is given on the application. The correct code is a ten-digit number that for Boone County would start with 007. It is very possible the first two zeroes are missing from the given number.

Based upon the submitted paperwork, the waste is acceptable under Permit No. 1994-547-LFM as a special waste. The analysis is valid for five years, expiring in **June 2004**.

If you have any questions regarding this review, please give me a call. Thank you.

Sincerely,

Barry S. Schwalbe
Chemist

BSS:bss:dkr

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WINNEBAGO RECLAMATION SERVICES
ADMINISTRATIVE OFFICE
8403 Lindenwood Road · Rockford, IL 61109 · 815-874-4806 · 815-874-4630 FAX

Form 1-SWP

SPECIAL WASTE PROFILE SHEET

Waste Stream Number (N/A if new application) _____

I. WASTE GENERATOR INFORMATION

1. Generator Name: Illinois Environmental Protection Agency
2. Site Information — Address: 424 Fairview Blvd — County: Boone
   City: Belvidere — State: IL — Zip: 61008
3. Mailing Information (if different) — Address: 8445 Keystone Crossing Suite 105 — County:
   City: Indianapolis — State: Indiana — Zip: 46240
4. Generator IEPA Code: 70050017 — 5. Generator SIC Code:
6. Generator Contact Name: John Grabs
7. Contact Telephone Number: 1-317-722-0870

II. TRANSPORTER INFORMATION

1. Method of Shipment (circle): **Bulk Solid** | Bulk Liquid | Bulk Sludge | Other _____
2. Transport Frequency (circle): One Time | **Daily** | Weekly | Bi-Weekly | Monthly | Bimonthly | Quarterly | Semi-Annually
3. Transporter(s)
   a. Name: Rockford Blacktop — Telephone Number: 654-4700
   b. Name: Kasper trucking — Telephone Number: 756-3331
   c. Name: _____ — Telephone Number: _____

III. PHYSICAL CHARACTERISTICS OF WASTE

1. Waste Name: Contaminated Soil
2. Process/Operation Name: Land Application of waste
3. Process Description: Waste consisted of bronze, brass, and nickel sludge
4. Special Handling Instructions (if any): None
5. Color: brown — 6. Odor: none
7. Waste Phase (circle): **Solid** | Semi-solid | Liquid | Gas | Powder — 8. Percent Solids: 86.94
9. Flash Point: >212°F — 10. pH: 8.69 — 11. Free Liquids (Y/N): N

Form 1a

· SPECIAL WASTE RECERTIFICATION ·

Waste Stream Authorization No. _____

Manifest Number _____

Generator Name: Illinois Environmental Protection Agency

Site Address: 424 Fairview Blvd.
Belvidere, IL 61008

Waste Name: Contaminated Soil

Check Section I or II Below –

I. ____ There has been a change in the characteristics of the special waste stream due to one of the following:

a) change of a raw material used in the waste generating process;
b) change in the waste-generating process itself;
c) change in a physical characteristic of the special waste; and/or
d) new information has been documented concerning the human health effects of exposure to the special waste.

If any of these changes have occurred, a new laboratory analysis and profile sheet is to be completed. Attach copies of the new chemical analysis and a new profile sheet with the appropriate signature.

II. X There have been no changes that would alter the physical or hazardous characteristics of the special waste stream.

Attach a copy of the original waste profile sheet.

I hereby certify, to the best of my knowledge, that the information contained in this certification and the information in the following waste profile sheet is entirely true and correct.

[signature] 7-22-99

Authorized Representative Signature — Date

John Grabs — Tetra Tech EM Inc. for IL Environmental Protection Agency

Authorized Representative Printed Name — Title

III. PHYSICAL CHARACTERISTICS OF WASTE (continued)

12. Waste Composition

Major Components	Percent
Contaminated Soil	100%
Total	100%

IV. CHEMICAL CHARACTERISTICS OF WASTE (all may not be required)

1. Metal Concentrations (given in ppm or mg/L)

	TOTAL	TCLP	Limit
Arsenic		< 0.002	5.0
Barium		< 1.0	100.0
Cadmium		< 0.001	1.0
Chromium		< 0.001	5.0
Lead		< 0.002	5.0
Mercury		< 0.0005	0.2
Selenium		0.004	1.0
Silver		< 0.001	5.0

3. Miscellaneous Parameters (given in ppm or mg/L)

Cyanide			
	Total	0.12	10.0
	Reactive	< 10	10.0
Sulfide			
	Total	2.4	10.0
	Reactive	< 10	10.0
Phenol		< 2.5	1,000.0
EOX		38.3	1,000.0
PCBs	SEE ANALYTICAL (ALL BELOW MINIMUM DETECTION LIMITS)		5.0

2. Organic Concentrations (given in ppm or mg/L)

	TOTAL	TCLP	Limit
Benzene		< 0.05	0.50
Carbon Tetrachloride		< 0.05	0.50
Chlorobenzene		< 0.05	100.0
Chloroform		< 0.05	6.0
Cresol		< 0.1	200.0
1,4-Dichlorobenzene		< 0.1	7.50
1,2-Dichlorosthane		< 0.05	0.50
1,1-Dichloroethene		< 0.05	0.70
2,4-Dinitrotoluene		< 0.1	0.130
Hexachlorobenzene		< 0.1	0.130
Hexachlorobutadiene		< 0.1	0.50
Hexachlorocthane		< 0.1	3.0
2-Butanone (MEK)		< 0.1	200.0
Nitrobenzene		< 0.1	2.0
Pentachlorophenol		< 0.5	100.0
Pyridine		< 0.5	5.0
Tetrachloroethene		< 0.05	0.70
Trichloroethene		< 0.05	0.50
2,4,5-Trichlorophenol		< 0.1	400.0
2,4,6-Trichlorophenol		< 0.1	2.0
Vinyl chloride		< 0.1	0.20

4. RCRA Pesticides/Herbicides (given in ppm or mg/L)

Chlordane	< 0.005	0.030		Endrin	< 0.001	0.020
Heptachlor	< 0.005	0.0080		Lindane (gamma-BHC)	< 0.005	0.40
Methoxychlor	< 0.005	10.0		Toxaphene	< 0.01	0.50
2,4-D	< 0.0012	10.0		2,4,5-TP (Silvex)	< 0.0017	1.0

IV. CHEMICAL CHARACTERISTICS OF WASTE (continued)

5. Hazardous Substances (circle Y/N) (N)

Does this waste stream contain any of the following:

a.	Listed Hazardous Waste	Y (N)
b.	PCBs	Y (N)
c.	Dioxins	Y (N)
d.	Organic Solvents	Y (N)
e.	Pathogens	Y (N)
f.	Biological Materials	Y (N)
g.	Radioactive Materials	Y (N)

V. LIST OF ATTACHMENTS (all may not be required; see Section VI)

____	Form 1-a:	Generator Recertification Form	X	Form 4:	RCRA Pesticide/Herbicide Certification
X	Form 2:	Representative Sample Certification	X	Form 5:	Cyanide/Sulfide Certification
X	Form 3:	Non-Hazardous Waste Certification	X	Form 6:	PCB/Phenol/Solvents Waste Certification

Other: _____

VI. EXCEPTIONS

- The generator may certify that the eight pesticides would not reasonably be expected to be present in their waste. By the completion of Form 4, the generator would not have to analyze for the constituents in Section IV.4.
- Petroleum contaminated media and debris from LUST sizes are temporarily exempt from full TCLP analysis. Required parameters are based upon the petroleum contamination.
- Form 5: Cyanide/Sulfide Certification needs to be completed only if cyanide and/or sulfide is tested and detected above 10.0 ppm.
- Form 6: PCB/Phenol/Solvents Waste Certification needs to be completed only if deemed necessary in the review process.

VII. GENERATOR CERTIFICATION

I hereby certify, under penalty of law, that the above and attached information is complete and accurate to the best of my knowledge, that no deliberate or willful emissions of composition or properties exist, and that all known or suspected hazards have been disclosed. This waste does not contain any hazardous wastes as defined in 35 IAC 721 and 40 CFR 261, does not contain medical or infectious waste, does not contain any PCBs as requested under TSCA (40 CFR 761), and does not contain any 2,3,7,8-Tetrachloredibenodioxin (2,3,7, & TCDD) or any other dioxin.

J. C. Dr

Signature

7/22/99

Date

John Grabs

Name (Type or Print)

Tetra Tech EM Inc. for Illinois Environmental Protection Agency

Title

· REPRESENTATIVE SAMPLE CERTIFICATION ·

THIS CERTIFICATION SHOULD BE COMPLETED IN IT'S ENTIRETY BY THE INDIVIDUAL OBTAINING THE SAMPLE FOR DISPOSAL.

Generator's Name: Illinois Environmental Protection Agency

Generator's Address: 424 Fairview Avenue
Belvidere, Illinois 61008

Contact Name: Lynne M. Paulli

Telephone Number: (815) 654-4726

NAME OF WASTE: Contaminated Soil

Date Sampled: 7/20/99

Type of Waste (circle): Solid | Sludge | Liquid | Other _____

Composite Samples: (X) Yes | ( ) No

Comments (if any): _____

I CERTIFY TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE SAMPLE DESCRIBED ABOVE IS REPRESENTATIVE OF THE WASTE TO BE MANAGED.

Lynne M. Paulli
(Printed or Typed Name)

Lynne M. Paulli 7-22-99
(Authorized Signature, Date)

Project Manager
(Title)

Environmental Contractors of Illinois, Inc.
(Company)

NON-HAZARDOUS WASTE CERTIFICATION

GENERATORS NAME: Illinois Environmental Protection Agency

GENERATORS ADDRESS: 424 Fairview Blvd

Belvidere, Il 61008

NAME OF WASTE: Contaminated Soil

I hereby certify that the waste identified above does not contain or has not come into contact with any hazardous waste listed in 40 CFR Section 261.30 - 261.33 and 35 IL Adm. Code 721.130 - 721.133 and is non-hazardous according to 40 CFR 261.1 - 261.20 and 35 IL Adm. Code 721.101 - 721.133.

John Grabs
(Authorized Representative)

Authorized Signature

Tetra Tech EM Inc. for IL Environmental Protection Agency
Title

7-22-99
Date

RCRA

· PESTICIDE/HERBICIDE CERTIFICATION ·

GENERATORS NAME: Illinois Environmental Protection Agency

GENERATORS ADDRESS: 424 Fairview Blvd.

Belvidere, IL 61108

NAME OF WASTE: Contaminated Soil

I HEREBY CERTIFY THAT NONE OF THE FOLLOWING RCRA PESTICIDES AND/OR HERBICIDES LISTED BELOW WERE USED IN THE GENERATING PROCESSES INVOLVED IN THE PRODUCTION OF THE WASTE IDENTIFIED ABOVE AND, TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE WASTE DOES NOT CONTAIN HAZARDOUS CONCENTRATIONS OF THESE SUBSTANCES.

Endrin	Toxaphene
Methoxychlor	2,4-D
Lindane	2,4,5-TP Silvex
Chlordane	Heptachlor and its epoxide

John Grabs

(Authorized Representative-Printed or Typed)

X J C. [signature]

Authorized Signature

Tetra Tech EM Inc for IL Environmental Protection Agency

Title

7-22-99

Date

SULFIDE/CYANIDE CERTIFICATION

For wastes containing greater than 10 ppm reactive cyanide or reactive sulfide, the Generator is required to provide a signed and dated statement indicating that none of the following have occurred:

		YES	NO
1)	The waste has caused injury to a worker because of H_2S or HCN generation;		X
2)	That the OSHA work place air concentration limits for H_2S and/or HCN have been exceeded in areas where the waste is generated, stored or otherwise handled, and		X
3)	That air concentrations or H_2S and/or HCN, above few ppm, have been encountered in areas where the waste is generated, stored or otherwise handled.		X

GENERATORS NAME: Ilinois Environmental Protection Agency

WASTE NAME: Contaminated Soil

Signed: J. C. Dun
Authorized Representative

John Grabs
Tetra Tech EM Inc. for IL Environmental Protection Agency
Printed Name and Title

7-22-99
Date

Form 6

· PHENOL/PCB/SOLVENT WASTE CERTIFICATION ·

GENERATOR NAME: Illinois Environmental Protection Agency

SITE ADDRESS: 424 Fairview Blvd
Belvidere, IL 61008

MAILING ADDRESS: c/o Tetra Tech EM Inc.
(if different) 8445 Keystone Crossing Suite 105
Indianapolis, Indiana 46240

WASTE NAME: Contaminated Soil

I hereby certify that none of the following chemicals listed below were used in the generating processes involved in the production of the waste identified above and, to the best of my knowledge and belief, the waste does not contain hazardous concentrations of these substances.

Phenol

Polychlorinated Biphenyls (PCBs)

RCRA F-Listed Solvents

Authorized Representative Signature

7-22-99
Date

John Grabs
Authorized Representative Printed Name

Tetra Tech EM Inc. for IL Environmental Protection Agency
Title

First
Environmental
Laboratories, Inc.
1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233
IEPA Certification #100292

July 22, 1999

Ms. Lynne Paulli
ENVIRONMENTAL CONTRACTORS OF ILLINOIS
5290 Nimtz Road
Loves Park, IL 61111

Dear Ms Paulli

Enclosed are the analytical results in support of the project identified as "579" received by First Environmental Laboratories, Inc. on July 20, 1999. This sample was analyzed as directed on the enclosed chain of custody record.

PROJECT SUMMARY

All analyses were performed in accordance with methods from the USEPA publication, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, 3rd Edition, December, 1996. The specific method references are listed on the Analytical Report.

All analyses were performed within established holding times, and all Quality Control criteria as outlined in the methods have been met. QA/QC documentation and raw data will remain on file for future reference.

I thank you for the opportunity to be of service to you and look forward to working with you again in the future. Should you have any questions regarding any of the enclosed analytical data or need additional information, please contact me at 630-778-1200.

Sincerely,

W. Zaworski for

Stan Zaworski
Project Manager

QUICK FAX OfficeMax

Date: 7/22	# of Pages: 5
To: Lynne	From: Bell
Co./Dept.	Co./Dept.
Fax:	Fax:
Phone:	Phone:
Note:	E-Mail:

First
Environmental
Laboratories, Inc.
1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233
IEPA Certification #100292

Analytical Report

Client:	ECI		
Project ID:	579	Date Received:	07/20/99
Sample Number:	80628	Date Taken:	07/20/99
Sample Description:	Composite	Date Reported:	07/22/99

Analyte	Result	Units	Flags
TCLP Volatile Organic Compounds Method 8260B			
Analysis Date: 07/21/99			
Benzene	< 0.05	mg/L	
Methyl ethyl ketone (MEK)	< 0.1	mg/L	
Carbon tetrachloride	< 0.05	mg/L	
Chlorobenzene	< 0.05	mg/L	
Chloroform	< 0.05	mg/L	
1,2-Dichloroethane	< 0.05	mg/L	
1,1-Dichloroethene	< 0.05	mg/L	
Tetrachloroethene	< 0.05	mg/L	
Trichloroethene	< 0.05	mg/L	
Vinyl Chloride	< 0.1	mg/L	
TCLP Base-Neutral/Acid Compounds Method 8270C			
Preparation Date: 07/21/99			
Analysis Date: 07/21/99			
1,4-Dichlorobenzene	< 0.1	mg/L	
2,4-Dinitrotoluene	< 0.1	mg/L	
Hexachlorobenzene	< 0.1	mg/L	
Hexachlorobutadiene	< 0.1	mg/L	
Hexachloroethane	< 0.1	mg/L	
o-Cresol	< 0.1	mg/L	
m&p-Cresol	< 0.1	mg/L	
Nitrobenzene	< 0.1	mg/L	
Pentachlorophenol	< 0.5	mg/L	
Pyridine	< 0.5	mg/L	
2,4,5-Trichlorophenol	< 0.1	mg/L	
2,4,6-Trichlorophenol	< 0.1	mg/L	

First
Environmental
Laboratories, Inc.
1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233
IEPA Certification #100292

Analytical Report

Client:	ECI		
Project ID:	579	Date Received:	07/20/99
Sample Number:	80628	Date Taken:	07/20/99
Sample Description:	Composite	Date Reported:	07/22/99

Analyte	Result	Units	Flags
TCLP Pesticides Method 8081A			
Preparation Date: 07/21/99			
Analysis Date: 07/22/99			
Chlordane	< 0.005	mg/L	
Endrin	< 0.001	mg/L	
Heptachlor	< 0.005	mg/L	
Heptachlor Epoxide	< 0.005	mg/L	
Lindane	< 0.005	mg/L	
Methoxychlor	< 0.005	mg/L	
Toxaphene	< 0.01	mg/L	
TCLP Herbicides Method 8321A			
Preparation Date: 07/21/99			
Analysis Date: 07/22/99			
2,4,-D	< 0.0012	mg/L	
2,4,5-TP (Silvex)	< 0.0017	mg/L	
PCBs Method 8082			
Preparation Date: 07/20/99			
Analysis Date: 07/22/99			
Aroclor 1016	< 80.0	ug/kg	
Aroclor 1221	< 80.0	ug/kg	
Aroclor 1232	< 80.0	ug/kg	
Aroclor 1242	< 80.0	ug/kg	
Aroclor 1248	< 80.0	ug/kg	
Aroclor 1254	< 160	ug/kg	
Aroclor 1260	< 160	ug/kg	

First
Environmental
Laboratories, Inc.
1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233
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Analyte	Result	Units	Date Analyzed	Method
Flash Point (open cup)	No Flash @	212°F	07/22/99	1010M
pH @ 25°C, 1:10	8.65	units	07/20/99	9045C
Paint Filter	Liquid Not Present		07/22/99	9095
Total Solids	86.94	%	07/22/99	160.3
Phenol	<2.5	mg/kg	07/22/99	9065
Cyanide	0.12	mg/kg	07/22/99	9014
Cyanide, Reactive	<10	mg/kg	07/22/99	7.3.3.2.
Sulfide	2.4	mg/kg	07/21/99	9034
Sulfide, Reactive	<10	mg/kg	07/22/99	7.3.4.2.
EOX	38.3	mg/kg	07/22/99	9023
TCLP Metals				
Arsenic	<0.002	mg/L	07/21/99	6010B
Barium	<1.0	mg/L	07/21/99	6010B
Cadmium	<0.001	mg/L	07/21/99	6010B
Chromium	<0.001	mg/L	07/21/99	6010B
Lead	<0.002	mg/L	07/21/99	6010B
Mercury	<0.0005	mg/L	07/21/99	7470A
Selenium	0.004	mg/L	07/21/99	6010B
Silver	<0.001	mg/L	07/21/99	6010B

CHAIN OF CUSTODY RECORD

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COMPANY NAME: ECI
ADDRESS: 5290 NIMTZ ROAD LOVES PARK, IL 61111
PHONE: 815 654 4726 FAX: 815 636 4304
CONTACT NAME LYNNE PAULLE
SAMPLED BY: LYNNE PAULLE

Project I.D. 579
Send Report To: LYNNE PAULLE

ANALYSES

DATE/TIME TAKEN	SAMPLE DESCRIPTION	MATRIX	# OF CONTAINERS							COMMENTS	LAB I.D.
7/20/99	COMPOSITE	S	X							RUSH 48 hr	80628

Matrix Codes: S = Soil W = Water O = Other

Preserved in: Lab ☐ Field ☑ Cooler Temperature: _____ °C

Notes and Special Instructions: RUSH 48 hr TURNAROUND !!

Relinquished By:	Date/Time 7/20/99	Received By:	Date/Time 3:24 pm
Relinquished By:	Date/Time	Received By:	Date/Time
Relinquished By:	Date/Time	Received By:	Date/Time